

**FILED**  
6/24/2025  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	Case No.
v.	)	
	)	Violations: Title 21, United States
CHER FARLEY	)	Code, Sections 331(a), 331(k)

1:25-cr-00335

**COUNT ONE**

Magistrate Judge Gabriel A. Fuentes  
Cat 5 Random Assignment

The UNITED STATES ATTORNEY charges:

On or about May 1, 2023, at Earlville, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

CHER FARLEY,

defendant herein, caused the introduction into interstate commerce from China to  
Earlville, Illinois, a foreign drug labeled as “Botox,” which was misbranded within  
the meaning of Title 21, United States Code, Section 352(f)(1), as the labeling failed  
to bear adequate directions for use;

In violation of Title 21, United States Code, Sections 331(a) and 333(a)(1).

COUNT TWO

The UNITED STATES ATTORNEY further charges:

On or about November 15, 2023, at Earlville, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHER FARLEY,

defendant herein, caused the introduction into interstate commerce from China to Earlville, Illinois, a foreign drug labeled as “Sotox,” which was misbranded within the meaning of Title 21, United States Code, Section 352(f)(1), as the labeling failed to bear adequate directions for use;

In violation of Title 21, United States Code, Sections 331(a) and 333(a)(1).

**COUNT THREE**

The UNITED STATES ATTORNEY further charges:

On or about February 29, 2024, at Ottawa, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHER FARLEY,

defendant herein, did dispense and cause the dispensing of a drug labeled as “Botox,” a prescription drug within the meaning of Title 21, United States Code, Section 353(b)(1), to Victim NO without the prescription of a practitioner licensed by law to administer such drug, an act which resulted in the drug being misbranded while held for sale after shipment in interstate commerce from China;

In violation of Title 21, United States Code, Sections 331(k) and 333(a)(1).

**COUNT FOUR**

The UNITED STATES ATTORNEY further charges:

On or about March 1, 2024, at Earlville, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHER FARLEY,

defendant herein, did dispense and cause the dispensing of a drug labeled as “Botox,” a prescription drug within the meaning of Title 21, United States Code, Section 353(b)(1), to Victim MH without the prescription of a practitioner licensed by law to administer such drug, an act which resulted in the drug being misbranded while held for sale after shipment in interstate commerce from China;

In violation of Title 21, United States Code, Sections 331(k) and 333(a)(1).

COUNT FIVE

The UNITED STATES ATTORNEY further charges:

On or about March 14, 2024, at Ottawa, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHER FARLEY,

defendant herein, did dispense and cause the dispensing of a drug labeled as "Sotox," a prescription drug within the meaning of Title 21, United States Code, Section 353(b)(1), to Victim NO without the prescription of a practitioner licensed by law to administer such drug, an act which resulted in the drug being misbranded while held for sale after shipment in interstate commerce from China;

In violation of Title 21, United States Code, Sections 331(k) and 333(a)(1).

  
UNITED STATES ATTORNEY